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12 HITACHI AMERICA, LTD., HITACHI
13 DISPLAYS, LTD. (N/K/A JAPAN DISPLAY
INC.), HITACHI ASIA, LTD., HITACHI,
LTD., and HITACHI ELECTRONIC
DEVICES (USA), INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

18 IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

CASE NO.: 3:07-cv-05944-SC

MDL NO.: 1917

21 | This Document Relates To:

22 | Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al., No.
23 | 3:11-cv-05513-SC;

**DECLARATION OF ELIOT A.
ADELSON IN SUPPORT OF HITACHI
DEFENDANTS' MOTION IN LIMINE
TO COMPEL PLAINTIFFS TO REFER
TO DEFENDANT SHENZHEN SEG
HITACHI COLOR DISPLAY DEVICES,
LTD. BY ITS SPECIFIC, INDIVIDUAL
CORPORATE ENTITY NAME OR AS
"SEG"**

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

1 I, Eliot A. Adelson, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California and the Northern
3 District of California. I am a partner with Kirkland & Ellis LLP and counsel for Hitachi Ltd., Hitachi
4 Asia, Ltd., Hitachi America, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display Inc.), and Hitachi
5 Electronic Devices (USA), Inc. (collectively, the "Hitachi Defendants").

6 2. I submit this Declaration in Support of Hitachi's Defendants' Motion in Limine to
7 Compel Plaintiffs to Refer to Defendant Shenzhen SEG Hitachi Color Display Devices, Ltd. by its
8 Specific, Individual Corporate Entity Name or as "SEG", filed on February 13, 2015. Except for
9 those matters stated on information and belief, about which I am informed and believe to be true, I
10 have personal knowledge of the matters set forth herein, and could and would testify competently to
11 each of them.

12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]

16 5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the November 4,
17 2014 deposition of Patrick Barrett.

18 I declare under penalty of perjury under the laws of California that the foregoing is true and
19 correct to the best of my knowledge.

20 Executed this 13th day of February, 2015 at San Francisco, California.

21 /s/ Eliot A. Adelson

22 Eliot A. Adelson

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